

EPSTEIN BECKER & GREEN, P.C.
One Gateway Center
Newark, New Jersey 07102
Telephone: (973) 642-1900
Facsimile: (973) 642-0099
Attorneys for Plaintiffs
Ross University School of Medicine and
Global Education International, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROSS UNIVERSITY SCHOOL OF
MEDICINE and GLOBAL EDUCATION
INTERNATIONAL, INC.,

Plaintiffs,

v.

BEHZAD AMINI, WWW.ROSSU.NET,
WWW.ROSSMEDICALSCHOOL.ORG,
WWW.ROSSMEDSCHOOL.COM and
WWW.JOHNDOEROSSINFRINGINGSITES1
-20.DOE

Defendants.

Civil Action No. 3-13-cv-06121-AET-TJB

CIVIL CONTEMPT ORDER

This matter comes before the Court upon the application of plaintiffs Ross University School of Medicine (“RUSM”) and Global Education International, Inc. (collectively “Plaintiffs”) for entry of an order finding defendant Behzad Amini in civil contempt and imposing sanctions for his violation of the Court’s Order of Preliminary Injunction dated December 9, 2013 (“Preliminary Injunction”), as well as its Temporary Restraining Order dated October 16, 2013 and Order Providing for Continuing Injunction dated October 28, 2013, and the Court having considered the written submissions of the parties, and both parties having provided oral argument on December ____, 2013, and good cause having been shown;

IT IS on this ____ day of December, 2013,

1. Defendant Behzad Amini is hereby found in civil contempt for violating the Preliminary Injunction by sending an email to multiple recipients on December 15, 2013 accusing RUSM's Dean of having engaged in criminal conduct.

2. The Court further finds that in order to coerce Amini's future compliance and compensate Plaintiffs for losses caused by Amini's non-compliance, the following sanctions shall be imposed upon Amini effective immediately:

- a. striking with prejudice his pending motion to dismiss and motion to transfer;
- b. subjecting him to a fine of \$100.00 per day payable to the Court until he acknowledges in writing to the Honorable Anne E. Thompson of this Court that he understands that (i) the Preliminary Injunction prohibits Amini and all those acting in concert with him from disparaging by any means RUSM and any of its affiliated entities or agents, and (ii) any future violation of the Preliminary Injunction may result in the commencement of criminal contempt proceedings against him;
- c. subjecting him to a fine of \$100.00 per day payable to the Court until he forwards to all recipients of the December 15, 2013 a statement, in a form acceptable to the Court, that (i) he is aware of no basis for his allegations that RUSM's Dean engaged in criminal conduct, and (ii) his email of December 15, 2013 violated the Preliminary Injunction;
- d. ordering any future violations of the Preliminary Injunction by Amini and/or those acting in concert with him will subject Amini to a \$10,000.00 fine payable to the Court for each such violation; and
- e. awarding Plaintiffs their reasonable attorneys' fees and costs in bringing this contempt application.

Hon. Anne E. Thompson, U.S.D.J.